

STATEMENT OF BASIS (AI No. 9290)  
PER20060001

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0076368 to discharge to waters of the State of Louisiana.

THE APPLICANT IS:     Associated Grain Terminals, LLC  
                             MGMT Facility  
                             9184 Highway 23  
                             Belle Chasse, Louisiana 70037

ISSUING OFFICE:        Louisiana Department of Environmental Quality (LDEQ)  
                             Office of Environmental Services  
                             Post Office Box 4313  
                             Baton Rouge, Louisiana 70821-4313

PREPARED BY:         Lisa Kemp

DATE PREPARED:       March 28, 2006; updated April 17, 2006

1. PERMIT STATUS

A. Reason For Permit Action:

The Department of Environmental Quality proposes to revoke the previously issued Louisiana Pollutant Discharge Elimination System (LPDES) Permit No: LA0076368 and reissue an LPDES permit for a five-year term. Cargill, Inc. was previously issued an LPDES Permit effective December 1, 2003 for this facility, then known as the Non-Grain Food Ingredients (NGFI) Corn Milling K-2 Plant.

This is a dry bulk grain transfer barge. It was originally permanently moored on the east bank of the Mississippi River at River Mile 158.5, in Convent, St. James Parish. In a letter dated September 9, 2005, Cargill requested a modification to LPDES permit No. LA0076368 so that Cargill could relocate the K-2 Plant downriver. The proposed changes would allow the facility to become mobile and operate at Mississippi River Miles 56.8, 57.0, or 57.2 in Plaquemines Parish. All operations and discharges would remain the same. Since this would be a change in facility location, application for a new permit was required. Due to the fact that conditions in Plaquemines Parish resulting from Hurricane Katrina would delay the normal processing and public notice of the permit application, Cargill, Inc. submitted a letter dated September 21, 2005 to the Enforcement Division requesting an Administrative Order to allow them to relocate the K-2 Plant and continue to operate under the existing LPDES permit with the same limitations and conditions until a new permit could be reissued. The Enforcement Division issued Administrative Order No. WE-AO-05-0457 to Cargill, Inc. October 19, 2005. An application was submitted by Cargill November 17, 2005.

A modification request dated November 28, 2005 was received by this Office stating that effective October 31, 2005, this facility was sold to Associated Grain Terminals, LLC. According to the request, the facility is now known as MGMT. A new application was received by this Office February 8, 2006 from the new owner, Associated Grain Terminals, LLC. According to the application, the barge will be operated as a mobile facility. The barge will normally be docked at River Mile 57, near Phoenix, in Plaquemines Parish. Possible other locations include the currently permitted location in Convent, River Mile 158.5, the Harvest States site at River Mile 61.5, and Meraux Buoys at River Mile 86.5. All

operations and discharges will remain the same. The facility location change, the change to a mobile operation, and the ownership change will be addressed in the draft permit.

Upon the effective date of the final permit, the final permit shall replace the previously issued State (LPDES) permit. The LPDES permit number and the Agency Interest number shall remain the same due to Air Enforcement History (see Section 6, Compliance History).

B. LPDES permit -

LPDES permit effective date: December 1, 2003  
LPDES permit expiration date: November 30, 2008  
EPA has not retained enforcement authority.

C. LWDP permit - (WP1637)

LWDP permit effective date: November 14, 1995  
LWDP permit expiration date: November 13, 2000

D. Date Application Received: November 17, 2005; revised application from new owner received February 8, 2006; additional information received by email March 25, 2006, March 31, 2006, April 12, 2006, and April 17, 2006

2. FACILITY INFORMATION

A. FACILITY TYPE/ACTIVITY - dry bulk grain transfer facility

The facility is a dry bulk grain transfer facility situated on a 75-foot by 330-foot barge. Grain, such as corn, wheat, and soybeans, and grain byproducts, such as corn gluten feed pellets, corn gluten meal, and soybean meal, are received via barge on conveyor belts and hopper scales and directly transferred to barge and/or cargo ships. The facility transfers approximately two million tons of grain and grain byproducts per year.

The facility discharges grain deck washwater, treated sanitary wastewater, once-through non-contact cooling water from the generator engines, condensate from the air compressor and three air conditioners, filter backwash from the water plant, bilge water from the engine room, and fire system test water.

Outfall 001 consists of grain deck washwater. Approximately two times per week, deck-washing activities produce grain deck washwater that is discharged through Outfall 001 in an effort to minimize dust accumulation on site. The deck is swept prior to washing to minimize grain in washwater.

Outfall 002 consists of sanitary wastewater from restrooms and the kitchen area. The wastewater is routed to a package sanitary treatment plant, then overflows from the initial tank into a chlorinated dispenser for additional treatment prior to discharge to the Mississippi River via Outfall 002.

Outfall 003B consists of once-through non-contact cooling water used during heat exchange for Generator Engine #3 and engine room bilge water. The engine room bilge water is

treated with an oil/water separator. The oil separated during this process is pumped to the used oil storage tank.

Outfall 003C consists of once-through non-contact cooling water used during heat exchange for Generator Engine #2 and condensate. The condensate is generated from an air compressor.

Outfall 003D consists of the once-through non-contact cooling water used during heat exchange for Generator Engine #1.

Outfall 003E consists of once-through non-contact cooling water and condensate. Non-contact cooling water received via Outfall 003D is used as cooling water for three air conditioning units. The condensate is generated from these three air conditioning units.

Outfall 004 consists of filter backwash water from the Continental Water Plant (CWP). Intake water from the Mississippi River is pumped to the CWP and undergoes a filtering process ultimately creating potable water. The excess water and sand collected during the filtering process is pumped directly from the CWP and discharged via Outfall 004.

Outfall 005 consists of bilge water and fire systems test water. The bilge water is associated with accumulated water from washdown activities within the lower components of the rig. Fire systems test water is intake water used to prevent the washdown pump from overheating and provides positive pressure to the firefighting systems.

None of the facility's activities are subject to existing effluent limitations guidelines (ELGs).

#### B. FEE RATE

1. Fee Rating Facility Type: Minor
2. Complexity Type: I\*
3. Wastewater Type: III
4. SIC code: 4491, 5153

\* In Appendix A - Section IV (Relation of 1987 to 1977 Industries) of the Standard Industrial Classification Manual, the SIC code 4491 is equivalent to a previous SIC code of 4463. As per LAC33:IX.1319 Table I, SIC code 4463 is assigned Complexity Type II. The Complexity Type has been BPJ'd from II to I to match other similar facilities.

C. LOCATION – This is a mobile facility which will operate at four locations on the Mississippi River. Locations include Convent, at River Mile 158.5 in St. James Parish, Meraux Buoys at River Mile 86.5 in St. Bernard Parish, the Harvest States site at River Mile 61.5 in Plaquemines Parish, and River Mile 57.2, near Phoenix, in Plaquemines Parish. The barge will normally be docked at River Mile 57, near Phoenix, in Plaquemines Parish.

Coordinates at River Mile 57.0: Latitude 29° 37' 52.7", Longitude 89° 54' 53.5"

The land office is located at 9184 Highway 23, in Belle Chasse, Plaquemines Parish.

### 3. OUTFALL INFORMATION

#### Outfall 001

Discharge Type: intermittent discharge of grain deck washwater from deck-washing  
Treatment: none  
Location: at the point of discharge from the starboard side of the barge  
towards the stern  
Flow: 0.00055 MGD  
Discharge Route: directly to the Mississippi River

#### Outfall 002

Discharge Type: treated sanitary and domestic wastewater ( no food service waste)  
Treatment: activated sludge treatment plant and chlorination  
Location: at the point of discharge from the treatment facility on the starboard  
side of the barge towards the stern  
Flow: 0.00057 MGD  
Discharge Route: directly to the Mississippi River

Outfall 003A This outfall was deleted in the existing permit because the discharge  
was eliminated and the outfall capped."

#### Outfall 03B

Discharge Type: once-through non-contact cooling water from Generator Engine #3  
and treated bilge water  
Treatment: the bilge water is treated through an oil/water separator  
Location: at the point of discharge from the generator downstream of the  
oil/water separator on the port side of the barge towards the stern  
Flow: 0.48 MGD total (9600 gpd treated bilge water)  
Discharge Route: directly to the Mississippi River

#### Outfall 03C

Discharge Type: once-through non-contact cooling water from Generator Engine #2  
and air-compressor condensate  
Treatment: none  
Location: at the point of discharge from the air compressor on the port side of  
the barge towards the stern  
Flow: 0.48 MGD  
Discharge Route: directly to the Mississippi River

Outfall 03D

Discharge Type: once-through non-contact cooling water from Generator Engine #1  
Treatment: none  
Location: at the point of discharge from the generator on the port side of the barge towards the stern  
Flow: 0.12 MGD  
Discharge Route: to the Mississippi River directly or via Outfall 03E

Outfall 03E

Discharge Type: once-through non-contact cooling water and condensate from the air conditioning units  
Treatment: none  
Location: at the point of discharge from the compressor, downstream of the condensate discharge, on the port side of the barge towards the stern  
Flow: 0.14 MGD  
Discharge Route: directly to the Mississippi River

Outfall 004

Discharge Type: filter backwash water from the Continental Water Plant (CWP)  
Treatment: none  
Location: at the point of discharge from the water plant, on the starboard side, towards the stern  
Flow: 0.001 MGD  
Discharge Route: directly to the Mississippi River

Outfall 005

Discharge Type: intermittent discharge of bilge water and fire systems test water  
Treatment: none  
Location: at the point of discharge from the bilge system, on the port side, in the middle of the barge  
Flow: 0.00003 MGD  
Discharge Route: directly to the Mississippi River

4. RECEIVING WATERS

STREAM - Mississippi River

BASIN AND SEGMENT - Mississippi River Basin, Segment 070301

DESIGNATED USES -  
a. primary contact recreation  
b. secondary contact recreation  
c. propagation of fish and wildlife  
d. drinking water supply

## 5. PROPOSED EFFLUENT LIMITS

### Changes From Existing Permit:

The facility has changed locations and become a mobile operation. The facility also has a new owner and a new name. Operations and discharges remain the same as in the previous permit.

Outfalls 03B, 03C, 03D, and 03E – The sampling frequency has been increased per current LDEQ guidance for similar outfalls.

In order to provide better interface with LDEQ compliance tracking, the outfall designations have been changed to three character designations. For example, Outfall 003B is now 03B.

BASIS - See Rationale on Page 12

## 6. COMPLIANCE HISTORY/COMMENTS

### A. Compliance History

A review of LDEQ records from January 2003 to present revealed:

October 10, 2005 – Water Enforcement Administrative Order No. WE-AO-05-0457 issued allowing this facility to move to new location and continue to operate under the existing LPDES permit with the same limitations and conditions until a new permit is reissued

August 12, 2005 – Incident Report – grain dust and nauseous odor – incident report closed

June 20, 2005 – Air Enforcement Consolidated Compliance Order and Notice of Potential Penalty No. AE-CN-05-0100 was issued to Cargill, Inc. for failing to include in the facility's Standard Operating Procedures precautions to be taken during loading/unloading/transfer operations of meals or dusty cargo whenever the prevailing winds of 15-20 mph or greater have the potential for fugitive dust emissions to impact residential and/or public property.

February 6, 2004 – Incident Report – wind blowing grain from the grain elevator all over the area – incident report closed

December 19, 2003 – Amended Air Enforcement Compliance Order No. AE-AO-03-0169A – closed January 28, 2004

#### B. DMR Review/Excursions

A DMR review for the period January, 2004 to March, 2005 revealed the following excursions:

<u>Date</u>	<u>Parameter</u>	<u>Outfall</u>	<u>Reported Value</u>	<u>Permit Limits</u>
06/2004	Fecal Coliform	002	4500 col/100 mL	400 col/mL, avg.
12/2004	BOD	002	51 mg/L	45 mg/L weekly avg.
05/2005	net TOC	003E	8.2 mg/L	5 mg/L, max.
05/2005	Fecal Coliform	002	confluent	400 col/mL, avg.

#### 7. EXISTING EFFLUENT LIMITS

##### **Outfall 001 – intermittent discharge of grain deck washwater**

Visible sheen – observe 1/discharge  
Barge Best Management Practices  
Dock Washdown Best Management Practices

##### **Outfall 002 – treated sanitary wastewater**

Effluent Parameter	Monthly Average	Weekly Average	Measurement Frequency
Flow - GPD	Report	Report	1/ 6 months
BOD5	---	45 mg/l	1/6 months
TSS	---	45 mg/l	1/6 months
Fecal Coliform Colonies/100 ml	---	400	1/6 months
pH – Allowable Range Standard Units	6.0 minimum	9.0 maximum	1/6 months

**Outfall 003B – once-through non-contact cooling water from Generator Engine #3 and treated bilge water**

Effluent Parameter	Monthly Average	Daily Maximum	Measurement Frequency
Flow - GPD	Report	Report	1/ month
COD	200mg/l	300mg/l	1/6 months
Oil & Grease	---	15 mg/l	1/6 months
pH – Allowable Range Standard Units	6.0 minimum	9.0 maximum	1/6 months

**Outfall 003C – once-through non-contact cooling water from Generator Engine #2 and air compressor condensate**

Effluent Parameter	Monthly Average	Daily Maximum	Measurement Frequency
Flow - GPD	Report	Report	1/ month
Net TOC	---	5 mg/l	1/6 months
Visible Sheen	---	No Presence	1/month
pH – Allowable Range Standard Units	6.0 minimum	9.0 maximum	1/6 months

**Outfall 003D – once-through non-contact cooling water from Generator Engine #1**

Effluent Parameter	Monthly Average	Daily Maximum	Measurement Frequency
Flow - GPD	Report	Report	1/ month
Net TOC	---	5 mg/l	1/6 months
pH – Allowable Range Standard Units	6.0 minimum	9.0 maximum	1/6 months



**Outfall 003E – once-through non-contact cooling water and condensate from the air conditioning units**

Effluent Parameter	Monthly Average	Daily Maximum	Measurement Frequency
Flow - GPD	Report	Report	1/ month
Net TOC	---	5 mg/l	1/6 months
Visible Sheen	---	No Presence	1/month
pH – Allowable Range Standard Units	6.0 minimum	9.0 maximum	1/6 months

**Outfall 004 - filter backwash from the Continental Water Plant**

Effluent Parameter	Monthly Average	Daily Maximum	Measurement Frequency
Flow - GPD	Report	Report	1/ month
pH – Allowable Range Standard Units	6.0 minimum	9.0 maximum	1/ month

**Outfall 005 – intermittent discharges of bilge water and fire systems test water**

Effluent Parameter	Monthly Average	Daily Maximum	Measurement Frequency
Flow - GPD	Report	Report	1/ discharge
COD	---	100 mg/l	1/month
Oil & Grease	---	15 mg/l	1/month
pH – Allowable Range Standard Units	6.0 minimum	9.0 maximum	1/month

## 8. ENDANGERED SPECIES

The receiving waterbody, Subsegment 070301 of the Mississippi River Basin, has been identified by the U.S. Fish and Wildlife Service (FWS) as habitat for the Pallid Sturgeon which is listed as an endangered species. LDEQ has not submitted this draft permit to the FWS for review in accordance with a letter dated October 21, 2005 from Watson (FWS) to Gautreaux (LDEQ). As set forth in the Memorandum of Understanding between the LDEQ and the FWS, and based on information provided by the FWS, LDEQ has determined that the issuance of the LPDES permit is not likely to have an adverse effect upon the Pallid Sturgeon. Effluent limitations are established in the permit to ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. The more stringent of technology and water quality based limits (as applicable) have been applied to ensure maximum protection of the receiving water.

## 9. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

## 10. 303d/TMDL

Subsegment 070301, Mississippi River – From Monte Sano Bayou to Head of Passes, is not listed on LDEQ's Final 2004 303 (d) List as impaired, and to date no TMDLs have been established. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by any future TMDLs.

## 11. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

## 12. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspapers of general circulation

Office of Environmental Services Public Notice Mailing List

Rationale for Associated Grain Terminals, LLC

1. **Outfall 001-** intermittent discharge of grain deck washwater from deck-washing (estimated flow is 0.00055 MGD)

Based on BPJ and on existing permits for similar facilities, no effluent limitations have been established for deck washwater from barges which are operated as dry bulk grain transfer facilities. Language is included in Part II which addresses pollution prevention practices for the washdown activity. In the existing permit, observation for visible sheen once per discharge is required for Outfall 001. This requirement is now included in Conditions for Barges, Part II of the draft permit.

2. **Outfall 002 -** treated sanitary and domestic wastewater (no food service wastewater) (estimated flow is 0.00057 MGD)

<u>Pollutant</u>	<u>Limitation</u>		<u>Reference</u>
	Mo. Avg:Wkly Avg (lbs/day)	Mo. Avg:Wkly Avg (mg/l)	
Flow (MGD)	Report:Report	---:---	LAC 33:IX.2707.I.1.b
BOD5	---:---	---:45	LAG480000,BPJ,*
TSS	---:---	---:45	LAG480000,BPJ,*
Fecal Coliform colonies/100 mL(*1)	---:---	---:400	LAG480000,BPJ,*
pH min/max (su)	---:---	6.0 - 9.0 (min)(max)	LAG480000,BPJ,*

\* Existing LPDES permit  
BPJ Best Professional Judgement  
su Standard Units

- (\*1) Future water quality studies may indicate potential toxicity from the presence of residual chlorine in the treatment facility's effluent. Therefore, the permittee is hereby advised that a future Total Residual Chlorine Limit may be required if chlorine is used as a method of disinfection. In many cases, this becomes a NO MEASURABLE Total Residual Chlorine Limit.

**Treatment:** activated sludge treatment and chlorination

**Monitoring Frequency:** once per 6 months at the point of discharge from the treatment facility

**Limits Justification:** Flow reporting is according to LAC 33:IX.2707.I.1.b. Limitations for BOD5, TSS, fecal coliform, and pH are based on the existing LPDES permit and the Light Commercial General Permit, LAG480000, Schedule A.

3. **Outfall 03B** - once-through non-contact cooling water from Generator Engine #3 and treated bilge water (estimated flow is 0.48 MGD total (9600 gpd treated bilge water))

<u>Pollutant</u>	<u>Limitation</u>		<u>Reference</u>
	Mo. Avg:Daily Max (lbs/day)	Mo. Avg:Daily Max (mg/l)	
Flow (MGD)	Report:Report	---:---	LAC 33:IX.2707.I.1.b
COD	---:---	200:300	*, BPJ
Oil and Grease	---:---	---: 15	*, BPJ
pH min/max (su)	---:---	6.0-9.0 (min)(max)	LAG480000, BPJ

\* Existing LPDES permit and existing permits with similar outfalls  
BPJ Best Professional Judgement  
su Standard Units

**Treatment:** the bilge water is treated through an oil/water separator.

**Monitoring Frequency:** Flow shall be monitored once per month based on the existing LPDES permit and the General Permit for Light Commercial Facilities, LAG480000 Schedule E. COD, oil and grease, and pH shall be monitored once a month. Although there have been no excursions in the past three years, the frequency has been increased because sampling once per six months is not sufficient to demonstrate continued compliance for a discharge of this size and to be consistent with current LDEQ guidance for similar discharges.

**Limits Justification:** The flow reporting requirement is consistent with LAC 33:IX.2707.I.1.b. COD and Oil and Grease limitations are based on the existing LPDES permit, BPJ, and existing permits with similar outfalls. The pH limitations are based on the existing LPDES permit and LAG480000 Schedule E effluent limitations.

**4. Outfall 03C - once-through non-contact cooling water from Generator Engine #2 and air-compressor condensate (estimated flow is 0.48 MGD)**

<u>Pollutant</u>	<u>Limitation</u>		<u>Reference</u>
	Mo. Avg:Daily Max (lbs/day)	Mo. Avg:Daily Max (mg/l)	
Flow (MGD)	Report:Report	---:---	LAC 33:IX.2707.I.1.b
Net TOC (*1)	---:---	---:5	LAG480000, *, BPJ
pH min/max (su)	---:---	6.0-9.0 (min)(max)	LAG480000, *, BPJ
Visible Sheen	---:---	---:No presence	LAG480000, *, BPJ

\* Existing LPDES permit  
BPJ Best Professional Judgement  
su Standard Units

(\*1) Net = Effluent - Influent. Sampling for the TOC parameter shall be required only when additives of any kind are used in the non-contact cooling water or when the cooling water may be contaminated with organics. The TOC of the discharge shall not exceed the intake TOC by more than 5.0 mg/L. Simultaneous sampling of the effluent and the influent shall be required to establish the net value. The influent, effluent, and net value shall be reported on the DMR.

**Treatment:** None

**Monitoring Frequency:** Flow shall be monitored once per month based on the existing LPDES permit. Visible sheen shall be observed once per month based on the General Permit for Light Commercial Facilities, LAG480000 Schedule H and the previous permit. Net TOC and pH shall be monitored once month. Although there have been no excursions in the past three years, the frequency has been increased because sampling once per six months is not sufficient to demonstrate continued compliance for a discharge of this size and to be consistent with current LDEQ guidance for discharges of non-contact cooling water.

**Limits Justification:** Monthly flow reporting is consistent with LAC 33:IX.2707.I.1.b. Net TOC and pH limitations are based on the existing LPDES permit and the General Permit for Light Commercial Facilities, LAG480000 Schedule E. Visible sheen is based on the existing LPDES permit and the General Permit for Light Commercial Facilities, LAG480000 Schedule H.

**5. Outfall 03D - once-through non-contact cooling water from Generator Engine #1**  
(estimated flow is 0.12 MGD)

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg:Daily Max (lbs/day)	Mo. Avg:Daily Max (mg/l)	<u>Reference</u>
Flow (MGD)	Report:Report	---:---	LAC 33:IX.2707.I.1.b
Net TOC (*1)	---:---	---:5	LAG480000, *, BPJ
pH min/max (su)	---:---	6.0-9.0 (min)(max)	LAG480000, *, BPJ

\* Existing LPDES permit  
BPJ Best Professional Judgement  
su Standard Units

(\*1) Net = Effluent - Influent. Sampling for the TOC parameter shall be required only when additives of any kind are used in the non-contact cooling water or when the cooling water may be contaminated with organics. The TOC of the discharge shall not exceed the intake TOC by more than 5.0 mg/L. Simultaneous sampling of the effluent and the influent shall be required to establish the net value. The influent, effluent, and net value shall be reported on the DMR.

**Treatment:** None

**Monitoring Frequency:** Flow shall be monitored once per month based on the existing LPDES permit, and the General Permit for Light Commercial Facilities, LAG480000 Schedule E. Net TOC and pH shall be measured once per month. Although there have been no excursions in the past three years, the frequency has been increased because sampling once per six months is not sufficient to demonstrate continued compliance for a discharge of this size and to be consistent with current LDEQ guidance for discharges of non-contact cooling water.

**Limits Justification:** Flow reporting is consistent with LAC 33:IX.2707.I.1.b. Net TOC and pH limitations are based on the existing LPDES Permit and the General Permit for Light Commercial Facilities, LAG480000 Schedule E effluent limitations.

**6. Outfall 03E - once-through non-contact cooling water and condensate from the air conditioning units (estimated flow is 0.14 MGD)**

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg:Daily Max (lbs/day)	Mo. Avg:Daily Max (mg/l)	<u>Reference</u>
Flow (MGD)	Report:Report	---:---	LAC 33:IX.2707.I.1.b
Net TOC (*1)	---:---	---:5	LAG480000, *, BPJ
pH min/max (su)	---:---	6.0-9.0 (min)(max)	LAG480000, *, BPJ
Visible Sheen	---:---	---:No presence	LAG480000, *, BPJ

\* Existing LPDES permit  
BPJ Best Professional Judgement  
su Standard Units

(\*1) Net = Effluent - Influent. Sampling for the TOC parameter shall be required only when additives of any kind are used in the non-contact cooling water or when the cooling water may be contaminated with organics. The TOC of the discharge shall not exceed the intake TOC by more than 5.0 mg/L. Simultaneous sampling of the effluent and the influent shall be required to establish the net value. The influent, effluent, and net value shall be reported on the DMR.

**Treatment:** None

**Monitoring Frequency:** Flow shall be monitored once per month based on the existing LPDES permit. Visible sheen shall be observed once per month based on the existing permit and the General Permit for Light Commercial Facilities, LAG480000 Schedule H. Net TOC and pH shall be monitored once per month. Although there has only been one excursion in the past three years, the frequency has been increased because sampling once per six months is not sufficient to demonstrate continued compliance for a discharge of this size and to be consistent with current LDEQ guidance for similar discharges.

**Limits Justification:** Monthly flow reporting is consistent with LAC 33:IX.2707.I.1.b. Net TOC and pH limitations are based on the existing LPDES permit and the General Permit for Light Commercial Facilities, LAG480000 Schedule E. The visible sheen limitation is based on the existing permit and the General Permit for Light Commercial Facilities, LAG480000 Schedule H.



**7. Outfall 004 - filter backwash water from the Continental Water Plant (CWP)**  
(estimated flow is 0.001 MGD)

<u>Pollutant</u>	<u>Limitation</u>		<u>Reference</u>
	Mo. Avg:Daily Max (lbs/day)	Mo. Avg:Daily Max (mg/l)	
Flow (MGD)	Report:Report	---:---	LAC 33:IX.2707.I.1.b
pH min/max (su)	---:---	6.0-9.0 (min)(max)	LAG380000, *, BPJ

\* Existing LPDES permit  
BPJ Best Professional Judgement  
su Standard Units

**Treatment:** none

**Monitoring Frequency:** Flow and pH shall be monitored once per month based on the existing permit and the Potable Water Treatment Plant General Permit, LAG380000. Monitoring is to be conducted when discharging.

**Limits Justification:** Flow reporting is consistent with LAC 33:IX.2707.I.1.b. The pH limitations are based on the Potable Water Treatment Plant General Permit, LAG380000; Schedule A effluent limitations and the existing permit.

Note: LAG380000 permit does not require a TSS limitation on filter backwash water when the facility discharges to the same waterbody that was used for intake. Associated Grain Terminals, LLC takes in surface water from the Mississippi River and discharges back to the Mississippi River.

**8. Outfall 005 - intermittent discharges of bilge water and fire systems test water**  
(estimated flow is 30 gpd)

<u>Pollutant</u>	<u>Limitation</u>		<u>Reference</u>
	Mo. Avg:Daily Max (lbs/day)	Mo. Avg:Daily Max (mg/l)	
Flow (MGD)	Report:Report	---:---	LAC 33:IX.2707.I.1.b
COD	---:---	---:100	*, BPJ
Oil and Grease	---:---	---:15	*, BPJ
pH min/max (su)	---:---	6.0-9.0 (min)(max)	*, BPJ

\* Existing LPDES permit  
BPJ Best Professional Judgement  
su Standard Units

**Treatment:** None

**Monitoring Frequency:** Flow shall be monitored once per discharge based on the existing LPDES permit. COD, Oil and Grease, and pH shall be monitored once per month, when discharging, based on the existing permit.

**Limits Justification:** Flow reporting is consistent with LAC 33:IX.2707.I.1.b. COD, Oil and Grease, and pH limits are based on the existing LPDES permit.

**NOTE**

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.

**Please note that the stormwater runoff from facilities with the SIC 4491 is classified as "stormwater associated with industrial activity" as per LAC33:IX.2511B.14.h. when this facility type has vehicle maintenance shops, equipment cleaning operations, or airport deicing operations. However, it is considered that the barge BMPs are comparable to the stormwater pollution prevention requirements; therefore, the barge BMPs will be applied instead.**

## **Appendix A**

**APPENDIX A**

**Dry Commodities**

DRY BULK MATERIALS		
Grains and Grain Byproducts	Soybeans Corn Wheat	Soybean Meal Corn Gluten Meal Corn Gluten Feed Pellets

## **Appendix B**

Appendix B

Enforcement Division  
Office of Environmental Compliance  
Department of Environmental Quality  
P. O. Box 4312  
Baton Rouge, Louisiana 70821-4312

Mailing Addresses For Regional Offices

Acadiana Regional Office  
Surveillance Division  
Office of Environmental Compliance  
111 New Center Drive  
Lafayette, Louisiana 70508  
(337) 262-5584

Capital Regional Office  
Surveillance Division  
Office of Environmental Compliance  
Post Office Box 4312  
Baton Rouge, Louisiana 70821-4312  
(225) 219-3600

Northeast Regional Office  
Surveillance Division  
Office of Environmental Compliance  
1823 Highway 546  
West Monroe, Louisiana 71292  
(318) 362-5439

Northwest Regional Office  
Surveillance Division  
Office of Environmental Compliance  
1525 Fairfield Avenue, Room 520  
Shreveport, Louisiana 71130  
(318) 676-7476

Southeast Regional Office  
Surveillance Division  
Office of Environmental Compliance  
201 Evans Road, Bldg. 4, Suite 420  
New Orleans, LA 70123-5230  
(504) 736-7701

Southwest Regional Office  
Surveillance Division  
Office of Environmental Compliance  
1301 Gadwall Street  
Lake Charles, Louisiana 70615-5176  
(337) 491-2667

Jurisdictional Parishes For Each Regional Office

Acadia, Evangeline, Iberia (west of the Atchafalaya River), Lafayette, St. Landry, St. Martin (west of the Atchafalaya River), St. Mary, Vermilion

Ascension, Assumption, East Baton Rouge, East Feliciana, Iberia (East of the Atchafalaya River), Iberville, Livingston, Pointe Coupee, St. Helena, St. James, St. Martin (East of the Atchafalaya River), Tangipahoa, West Baton Rouge, West Feliciana

Avoyelles, Caldwell, Catahoula, Concordia, East Carroll, Franklin, Grant, Jackson, La Salle, Lincoln, Madison, Morehouse, Ouachita, Rapides, Richland, Tensas, Union, West Carroll, Winn

Bienville, Bossier, Caddo, Claiborne, De Soto, Natchitoches, Red River, Sabine, Webster

Jefferson, Lafourche, Orleans, Plaquemines, St. Bernard, St. Charles, St. John the Baptist, St. Tammany, Terrebonne, Washington

Allen, Beauregard, Calcasieu, Cameron, Jefferson Davis, Vernon